

## Other Issues?

## Reaction to Proposal?

## Other Solutions?

Issue	Proposed Solution	Other Ideas
<b>Permitting:</b> Additional Workload <i>Number of HAPs added by the proposal, along with changes to the rule will likely increase the time to do a HAP review.</i>	<ul style="list-style-type: none"> <li>Self-certification</li> <li>Screening filters</li> <li>Applicability filters</li> <li>Database development</li> <li>Standard conditions</li> <li>Consolidated language &amp; tables</li> </ul>	
<b>Permitting:</b> Inclusion Level <i>Decrease in the threshold levels will require that smaller sources are included in permit reviews.</i>	<ul style="list-style-type: none"> <li>Yet to be discussed</li> </ul>	
<b>Applicability:</b> Once In, Always In <i>Current policy does not allow for sources of Table 3 HAPs to reduce emissions below threshold levels to avoid BACT/LAER applicability.</i>	<ul style="list-style-type: none"> <li>Change policy to allow sources to cap emissions and avoid control technology review</li> </ul>	
<b>Compliance:</b> Effective Dates of Revisions <i>Difficulty in implementing revision in an effective, efficient and equitable manner.</i>	<ul style="list-style-type: none"> <li>See proposed schedule</li> </ul>	
<b>Compliance:</b> BACT/LAER Reviews <i>Increase in the numbers of reviews due to an increase in the number of Table 3 HAPs and lower thresholds.</i>	<ul style="list-style-type: none"> <li>Compliance options</li> <li>Screens and filters</li> <li>Policy change</li> </ul>	
<b>Compliance:</b> BACT/LAER Reviews <i>Review decisions are static, no apparent ability to revisit decisions as new technologies develop over time.</i>	<ul style="list-style-type: none"> <li>Yet to be discussed</li> </ul>	
<b>Compliance:</b> BACT/LAER Reviews <i>Risk assessments performed to assist in the evaluation of BACT/LAER decisions are not required by rule.</i>	<ul style="list-style-type: none"> <li>Include risk assessment language in the rule</li> </ul>	
<b>Compliance:</b> Exemptions <i>Exempt emissions from fuel combustion and indoor fugitive source may be allowing for an inappropriate amount health impact.</i>	<ul style="list-style-type: none"> <li>Evaluation of fossil fuel exemption has begun</li> </ul>	
<b>Compliance:</b> Accurate Information <i>Lack of easily accessible information for many of the HAPs and processes.</i>	<ul style="list-style-type: none"> <li>Training and tools</li> </ul>	
<b>Compliance:</b> Level of Detection <i>Many of the HAPs existing and proposed for regulation have very low threshold levels possibly necessitating the need to measure in the ppm or ppb. A number of these HAPs may have thresholds or source specific emission limits greater than level of detection.</i>	<ul style="list-style-type: none"> <li>Reasonable effort deemed to satisfy regulatory requirement</li> <li>Checkbox for inventory purposes as a suspected source of HAP (see supplementary material)</li> </ul>	
<b>Compliance:</b> Silica	<ul style="list-style-type: none"> <li>Proposed Workgroup</li> </ul>	
<b>Compliance:</b> Coal dust, wood dust	<ul style="list-style-type: none"> <li>Yet to be discussed</li> </ul>	